

The Honorable Robert S. Lasnik

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

ABDIKHADAR JAMA, an individual,
JEES JEES, an individual, and
MOHAMED MOHAMED, an individual,

Plaintiffs,

v.

GOLDEN GATE AMERICA LLC, a foreign
limited liability company, and EAN
HOLDINGS LLC, ENTERPRISE
HOLDINGS, INC., a foreign corporation, and
VANGUARD AUTOMOTIVE GROUP,
a foreign business entity d/b/a NATIONAL
CAR RENTAL, ALAMO RENT A CAR, and
ENTERPRISE RENT-A-CAR,

Defendants.

No. 2:16-cv-00611-RSL

JOINT STIPULATION AND
~~PROPOSED~~ ORDER TO RE-NOTE
PLAINTIFFS' CLASS CERTIFICATION
MOTION

STIPULATION

The parties stipulate as follows by and through their counsel of record:

WHEREAS, on May 11, 2017, plaintiffs filed their Motion for Class Certification, Appointment of Class Counsel, and Appointment of Class Representative (Dkt. 57) (the "Class Certification Motion"), with a noting date of June 9, 2017;

WHEREAS counsel for EAN Holdings LLC ("EAN Holdings") were not served with

STIPULATION TO RE-NOTE CLASS CERT MTN
(2:16-cv-611-RSL) - 1
4817-3357-3961v.1 0106725-000001

Davis Wright Tremaine LLP
LAW OFFICES
1201 Third Avenue, Suite 2200
Seattle, WA 98101-3045
206.622.3150 main · 206.757.7700 fax

1 the Class Certification Motion because they had not been added to the docket as counsel of
2 record for EAN Holdings;

3 WHEREAS, on June 1, 2017, EAN Holdings' counsel discovered that plaintiffs had
4 filed their class certification motion and that EAN Holdings had not been served, and later that
5 date, EAN Holdings' counsel contacted plaintiffs' counsel to alert them to the issue; and

6 WHEREAS, due to the service issue, the parties have agreed to re-note the Class
7 Certification Motion for June 23, 2017, and therefore, EAN Holdings' opposition will be due
8 on June 19, 2017, rather than the current due date of June 5, 2017.

9 NOW, THEREFORE, the parties agree that the current June 9, 2017, noting date for
10 plaintiffs' Class Certification Motion shall be struck and the motion will be re-noted for June
11 23, 2017, with the opposition and reply deadlines based on the June 23, 2017, re-noted date.

12 STIPULATED TO this 5th day of June, 2017.

13 DAVIS WRIGHT TREMAINE LLP

BADGLEY MULLINS TURNER PLLC

14
15 By: /s/ Harry J.F. Korrell

16 Harry J. F. Korrell, WSBA # 23173

17 Taylor Ball, WSBA #46927

18 Laura Turczanski, WSBA #47070

1201 Third Avenue, Suite 2200

Seattle, WA 98101-3045

Telephone: (206) 622-3150

Fax: (206) 757-7700

harrykorrell@dwt.com

taylorball@dwt.com

lauraturczanski@dwt.com

19
20
21
22 *Attorneys for Defendant EAN Holdings*
23 *LLC*

By: /s/ Duncan Turner

Duncan C. Turner

19929 Ballinger Way NE, Suite 200

Seattle, WA 98155

Telephone: (206) 621-6566

duncanturner@badgleyturner.com

LAW OFFICE OF DANIEL R. WHITMORE

By: /s/ Daniel Whitmore

Daniel R. Whitmore

2626 15th Avenue West, Suite 200

Seattle, WA 98118

Telephone: (206) 329-8400

dan@whitmorelawfirm.com

Attorneys for Plaintiffs

24
25
26
27 STIPULATION TO RE-NOTE CLASS CERT MTN

(2:16-cv-611-RSL) - 2

4817-3357-3961v.1 0106725-000001

Davis Wright Tremaine LLP

LAW OFFICES

1201 Third Avenue, Suite 2200

Seattle, WA 98101-3045

206.622.3150 main • 206.757.7700 fax

~~PROPOSED~~ ORDER

Pursuant to the stipulation of the parties, IT IS HEREBY ORDERED that:

1. The current June 9, 2017, noting date for plaintiffs' Motion for Class Certification, Appointment of Class Counsel, and Appointment of Class Representative (Dkt. 57) (the "Class Certification Motion") is stricken; and

2. Plaintiffs' Class Certification Motion is re-noted for June 23, 2017, with the opposition and reply deadlines based on the new noting date.

IT IS SO ORDERED.

DATED this 8th day of June, 2017.



Honorable Robert S. Lasnik
United States District Court Judge